

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC.
ET AL.,

Defendants.

Civil Action No. 2:23-cv-00352-JRG-RSP

JURY DEMANDED

**JOINT MOTION FOR ENTRY OF AGREED
DISCOVERY ORDER**

Pursuant to the Court’s Order setting a deadline to file a proposed Discovery Order (D.I. 11) and extension thereto (D.I. 35), Plaintiff Headwater Research, LLC (“Headwater”) and Defendants Cellco Partnership, d/b/a Verizon Wireless and Verizon Corporate Services Group Inc. (collectively, “Verizon” or “Defendants”),¹ (collectively, the “Parties”) hereby jointly request that the Court enter the proposed Discovery Order, attached hereto as Exhibit A.

¹ Verizon contends that Verizon Communications Inc. (“VCI”) is not a proper party to this case, and therefore VCI is not included as a moving party pending a resolution for dismissal of VCI.

Dated: October 19, 2023

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 19th day of October 2023, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster